

OVED & OVED_{LLP}
ATTORNEYS

August 3, 2020

VIA ECF

Hon. Jesse M. Furman
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *Garcia v. Roadway Moving Inc., et al.*
Case No. 20-cv-05570 (JMF)

Dear Judge Furman:

This law firm has been retained to represent defendant Roadway Moving & Storage, Inc. in the above-referenced matter. Pursuant to Rule I.E of Your Honor's Individual Rules of Practice in Civil Cases, we write to respectfully request that Defendant be granted until September 11, 2020 to respond to Plaintiff's complaint. The current deadline is August 12, 2020. The reason for this request is that we have just learned of this action and require time to assess the case, confer with our client, and prepare a response.

Plaintiff's counsel has consented to this request. This request will not affect any other deadlines in this matter, as the first appearance before the Court is an initial pre-trial conference scheduled for November 10, 2020. No prior extension requests have been made.

We thank the Court for its attention to this matter.

Respectfully submitted

/s/ Andrew J. Urgenson

Andrew J. Urgenson



THE OVED BUILDING
401 GREENWICH STREET
NEW YORK, NY 10013

T 212 226 2376
F 212 226 7555
OVEDLAW.COM